

August 12, 2011

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Structure and Practices of the Video Relay Service Program*,
CG Docket No. 10-51

Dear Ms. Dortch:

On August 11, 2011, James Perry, Michael Cole, Scott Pasquini and Alex Kerr of Madison Dearborn Partners ("MDP"), and John Nakahata of Wiltshire & Grannis, LLP, on behalf of Sorenson Communications, Inc. ("Sorenson") met with Paul de Sa, Chief, Office of Strategic Planning and Policy Analysis, and Nicholas Alexander of the Office of Strategic Planning and Policy Analysis.

During the meeting, MDP and Sorenson attendees discussed the prospect of restructuring the VRS rate structure to compensate providers on a "per active user" basis rather than on a "per minute basis." We noted that Sorenson estimates that there are some, but not an extremely large percentage of households that have more than one eligible deaf or hard of hearing user. We further discussed issues previously summarized in Sorenson's ex parte letters of July 29, 2011 and August 11, 2011. We reiterated the importance of a long term, stable system that recognized that existing providers were starting from existing levels of actual costs, including actual capital costs, while at the same time fulfilling the objectives of robust competition and continued functionally equivalent service. We also stated that the Commission should not, as part of the transition to a "per active user" structure, preclude providers from entering into contracts with subscribers, such as are common in wireless telecommunications, particularly when providers are furnishing subscribers with equipment.

A copy of this letter is being filed in the above-referenced dockets.

Sincerely,



John T. Nakahata
Counsel to Sorenson Communications, Inc.

cc: Paul de Sa
Nicholas Alexander